

VERIZON RESPONSE TO NJ BPU KPMG EXCEPTION

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| Exception #: | 6 |
| Component: | The testing of Verizon New Jersey (Verizon-NJ) switch translations by KPMG Consulting has resulted in a 28.6% failure rate. |
| Domain: | POP |
| Date Uncovered by KPMG: | 11/9/00 |
| Date VERIZON Received: | 11/9/00 |
| Date VERIZON Responded: | 12/1/00; 1/16/01 (1 st Revision) |
| Date KPMG Consulting Responded: | 12/13/00 |
| KPMG Summary Statement and | Verizon is not meeting required standards, resulting in damage to the CLEC-customer relationship due to unmet customer expectations. CLEC's cannot expect to satisfy and maintain customers when resale and UNE-P orders have a 28.6% failure rate, which greatly exceeds the performance standard of no more than a 5% failure rate. |
| Verizon Response: | <u>Verizon's 01/16/00 Reply to KPMG Consulting's 12/13/00 Response</u> |

Based on the KPMG response of 12/13/00, Verizon conducted an additional investigation on the following fifteen circuits in question, and found the following:

Items 1-8:

1. 002011NN0X000006- 6096715175 (KPMG references the wrong PON # for this circuit—the correct PON is 002121NN0X000003)
2. 002011NN0X000006- 6096715186 (KPMG references the wrong PON # for this circuit—the correct PON is 002121NN0X000004)
3. 002011NN0X000006- 6096715195 (KPMG references the wrong PON # for this circuit—the correct PON is 002121NN0X000005)
4. 002011NN0X000006- 6096715196 (KPMG references the wrong PON # for this circuit—the correct PON is 002121NN0X000005)
5. 010071NN0X000001- 6096715346
6. 010071NN0X000001- 6096715351
7. 013111NN0X000002- 7328310208
8. 038041NN0X000004- 7328312622

Verizon agrees that these circuits were not provisioned as UNE-P accounts with the trigger 43 codes. Verizon has researched the available data on each circuit, and has determined the root cause to be service order input errors. As a result of these errors, the circuits were not provisioned as requested. TISOC team leaders have reviewed the errors with the representatives responsible.

Item 17:

17. 050031NN0X000002- 6096715258

This line was not provisioned as requested on the LSR due to a service order error processed by the TISOC. This circuit was addressed in NJ Exception 3.

Verizon's initial response addressed several corrective actions which have been made to significantly improve service order quality. Verizon believes that substantial improvements have since been made in the TISOC in the area of service order accuracy.

Items 11-15:

- 11. 016091NN0X000001- 6096715291
- 12. 016091NN0X000003- 6096715293
- 13. 016091NN0X000004- 6096715294
- 14. 016091NN0X000005- 6096715295
- 15. 016091NN0X010002- 6096715292

Verizon verified that the following 5 circuits were provisioned as 2-way suspensions, as requested on the LSRS. The switch reports that KPMG received showed the 2-way suspensions as ICP-Y versus SUS O&T, which is used in other jurisdictions. A change has since been made to the MARCH system to show 2-way suspensions as SUS O & T.

Item 16:

- 16. 050021NN0X000002- 6096715263

KPMG originally stated that the circuit was disconnected, and it should be a working line. Verizon responded that the circuit should be disconnected per the LSR. Upon further investigation, Verizon found that the line was not disconnected due to a translation processing error by the RCMAC personnel. The translations have since been corrected, and intercept is on the line. This circuit was addressed in NJ Exception 3.

**KPMG Consulting
Response:**

KPMG Consulting's 12/13/00 Reply to Verizon's 12/01/00 Response

Based on the Verizon response of 12/01/00 KPMG investigated the seventeen items disputed. The KPMG investigation found:

Items I – 8.

KPMG identified 101 Switch Translations that were UNE-P. Of the 101 Switch Translations 82 have ASPORIG which is a custom routing code under the SRPAN USOC. This usually indicates an AIN arrangement. They also have active trigger 43 codes for off hook delay. The 82 lines were not ordered with this AIN arrangement but it has been provisioned by Verizon. The remaining 19 UNE-P lines do not have this AIN arrangement, and not all 19 were reported with it missing since they had other problems. KPMG contends that both sets of lines cannot be correct.

Items 9 – 10.

KPMG agrees.

Items 11 – 15.

The lines in question have been provisioned with suspend service originating which is one-way only. The lines were ordered with suspend service two-way. According to

LSOG 4.4 suspend service one-way is only available in NY, DE, and PA.

Item 16.

The LSR was placed on 9/20/00 and a completion notification was received on 9/21/00. The Switch Translations received from Verizon have a date of 10/25/00 and indicate a working line with multiple features.

Item 17.

The LSR was placed on 9/26/00 and a completion notification was received on 10/03/00. The Switch Translations received from Verizon have a date of 10/25/00 and indicate a working line with multiple features.

Verizon Response

12/01/00 Response to Exception

Verizon reviewed the 50 circuits, and concluded the following:

The seventeen circuits listed below were provisioned as requested on the LSR, and should not be included in this exception:

1. 002011NN0X000006, 6096715175- the line was provisioned as UNE-P, as requested
2. 002011NN0X000006, 6096715186- the line was provisioned as UNE-P, as requested
3. 002011NN0X000006, 6096715195- the line was provisioned as UNE-P, as requested
4. 002011NN0X000006, 6096715196- the line was provisioned as UNE-P, as requested
5. 010071NN0X000001, 6096715346- the line was provisioned as UNE-P, as requested
6. 010071NN0X000001, 6096715351- the line was provisioned as UNE-P, as requested
7. 013111NN0X000002, 7328310208- the line was provisioned as UNE-P, as requested
8. 038041NN0X000004, 7328312622- the line was provisioned as UNE-P, as requested
9. 012061NN0X010001- the TN# listed was incorrect. The correct TN# is 6096715321. Verizon received a SUP 1 to cancel this request.
10. 016061NN0X000001, 6096713329- Verizon received a SUP 1 to cancel this request
11. 016091NN0X000001, 6096715291- the account was suspended as requested
12. 016091NN0X000003, 6096715293- the account was suspended as requested
13. 016091NN0X000004, 6096715294- the account was suspended as requested
14. 016091NN0X000005, 6096715295- the account was suspended as requested
15. 016091NN0X010002, 6096715292- the account was suspended as requested
16. 050021NN0X000002, 6096715263- the line was disconnected as requested on the LSR
17. 050031NN0X000002, 6096715258- the line was disconnected as requested on the LSR

Of the remaining 33 circuits, Verizon agrees that the following seven circuits were not provisioned as requested in the switch. The circuits were all provisioned from *one* service order, for which the RCMAC representative did not type the requested three way calling and call waiting features into the switch. The RCMAC management has

reviewed this error with the representative, and stressed the importance of accurately provisioning features as requested by the customer. In addition, the RCMAC measures and monitors translation accuracy and provides feedback to their personnel on a regular basis, as detailed in our response to Exception 3.

1. 010071NN0X010002, 6096715354
2. 010071NN0X010002, 6096715356
3. 010071NN0X010002, 6096715357
4. 010071NN0X010002, 6096715359
5. 010071NN0X010002, 6096715360
6. 010071NN0X010002, 6096715362
7. 010071NN0X010002, 6096715363

The remaining 26 circuits were not provisioned as requested due to TISOC related errors made when issuing the service orders. The Team Leaders have since had contacts with each of their representatives accountable for these errors.

Since October 9th, Verizon has instituted numerous remedial improvements based on our recognition of the need for additional accuracy improvements.

- A weekly analysis of several hundred random service orders is performed to ensure service order accuracy. The results are used to generate a service accuracy report, which measures the metric for service order accuracy and summarizes the errors made by category. This report is then distributed to the TISOC management to develop their representatives who have made errors, and to provide continuation training on office wide issues that have been identified from the analysis.
- Verizon has lengthened the initial and continuation training classes provided to our representatives. This allows for more in depth training on a broad scope of material, which Verizon believes will reduce service order errors.
- The TISOC also emphasizes accuracy to the entire office through additional forms of communication such as electronic banner boards, E-mail alerts, updates to their local web site, overhead paging, and team huddles.

As a result of these corrective actions, Verizon has seen a significant improvement in quality over the last four weeks.

Based on the above, Verizon believes that substantial improvements have been made in the TISOC in the area of service order accuracy.